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11 UNITED STATES DISTRICT COURT
12
13 NORTHERN DISTRICT OF CALIFORNIA
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15 MARIA RUTENBURG, an individual,
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17 Plaintiff,
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19 v.
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21 TWITTER, INC., a Delaware Corporation,
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23 Defendant.
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CASE NO. 4:21-CV-00548-YGR

**DECLARATION OF GRACE YANG IN
SUPPORT OF JOINT STIPULATION TO: (1)
SUBMIT STREAMLINED BRIEFING UNDER
MODIFIED DEADLINES; AND (2) CONTINUE
INITIAL CASE MANAGEMENT
CONFERENCE AND ACCOMPANYING
DEADLINES**

1 I, GRACE YANG, hereby declare as follows:

2 1. I am an attorney at the law firm of Conrad | Metlitzky | Kane LLP, and I am licensed to
3 practice law in the State of California. Along with Mark R. Conrad, I am counsel of record for
4 Defendant Twitter, Inc. in the above-captioned matter. I have personal knowledge of the facts set forth
5 in this declaration, and if called upon as a witness, I could and would testify competently as to the
6 following facts.

7 2. Undersigned counsel at Conrad | Metlitzky | Kane LLP were only recently retained to
8 represent Defendant in this matter.

9 3. On February 4, 2021, I met and conferred with Mark L. Javitch, the counsel of record for
10 Plaintiff Maria Rutenburg. We discussed Plaintiff's intention to renew her motion for a preliminary
11 injunction, as well as Defendant's intention to file a motion to dismiss.

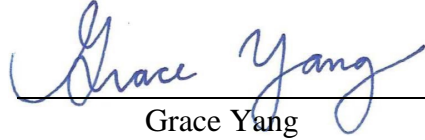
12 4. As discussed in the meet-and-confer, Mr. Javitch and I agree that there is substantial
13 overlap between the issues that would be raised by Plaintiff's renewed motion for a preliminary
14 injunction as well as Defendant's motion to dismiss. We also agreed that it will promote efficiency and
15 conserve the resources of the Court for the Parties' respective motions to be briefed simultaneously and
16 to be scheduled for a single hearing before the Court, pursuant to the agreed-upon briefing schedule set
17 forth in the Parties' joint stipulation dated February 5, 2021.

18 5. Mr. Javitch and I further agree that it will promote judicial economy to continue the
19 initial case management conference in this case (as well as associated deadlines relating to initial
20 disclosures, conferences under Rule 26(f), and ADR), until after the Court has ruled upon the Parties'
21 respective motions.

22 6. There have been no previous time modifications in this case, either by stipulation or by
23 court order.

24 7. If approved, the joint stipulation dated February 5, 2021 would push back the initial case
25 management conference and its accompanying deadlines by four weeks.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is true
2 and correct. Executed this 5th day of February 2021, at Berkeley, California.

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4 
5 Grace Yang